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**VIA ECF**

May 26, 2023

Hon. Victor Marrero  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: *Baliga, et al. v. Link Motion Inc., et al.*, Case No. 1:18-cv-11642-VM-VF (S.D.N.Y.)  
Order to Show Cause

Dear Judge Marrero:

I represent Dr. Vincent Wenyong Shi (“Dr. Shi”). I write to request that the Court enter the attached amended Order to Show Cause. Contrary to the Receiver’s contentions, this Court’s prior rulings regarding the Receiver’s authority and the EGMs were issued without the benefit of the information revealed by the Receiver’s filing at 5:47 p.m. May 24, 2023, when he filed on the docket the June 18, 2019 Secured Convertible Promissory Note with Mr. Guo (as amended, the “Convertible Note”) and related documents. *See* Dkt. 419. These documents show that, in direct contravention to this Court’s prior June 18, 2019 and January 17, 2020 orders, these documents were **never** served on counsel for Dr. Shi and Dr. Shi was deprived of timely notice and an opportunity to be heard. As set forth in our moving papers, this disclosure has revealed a fraud on the Court by the Receiver and his agent Mr. Guo, *see* Dkt. 421-5, which merits the entry of the Order to Show Cause and TRO pending final resolution of objections to the accounting, discharge of the Receiver, and Dr. Shi’ appeal of the Order entered at Dkt. 417.

A TRO is also required because Dr. Shi has appealed the Order entered on May 10 2023 at Dkt. 417 and a stay is required to permit the appellate court to consider Dr. Shi’s appeal. The urgency for this request resulted from the Receiver’s service of notices of EGMs on May 18, 2023.

Respectfully submitted,

*/s/ Michael James Maloney*

Michael James Maloney

cc: All counsel of record (via ECF)